

## **DRAFT PLAN FOR INCREASING LOCAL AGENCY MONITORING PERFORMANCE:**

In preparation for assembling a written plan of action to address non-compliance issues found during Local Agency on-site monitoring visits, background information has been provided below. Three monitoring visits (approximately 6 years) from each agency were reviewed and the number of findings compiled. Of the program areas currently reviewed, the list of findings revealed twenty-one areas where non-compliance occurred. Local agencies are responsible for compliance in all areas reviewed. The spreadsheet did show that the findings were equally distributed between both the administrative side of the program and the nutrition side.

Monitoring of local programs by the State WIC office staff is mandated by Federal Regulations. The State WIC staff continues to refine oversight processes and strives for improvement in its responsibilities to local agency WIC programs. State staff was asked by the WFSG to develop performance standards identified as a priority during the January 31<sup>st</sup> WFSG meeting regarding: legality, quality, accountability, consistency, and standardization of expectations.

For successful program management, standards of measurement for monitoring will be put in place beginning with the Federal Fiscal Year of 2013.

The options to improve program operations offered by the WIC Future Studies Group are restated here for your information. The list is in no particular order:

1. Corrective Action Plan
2. Communication through the Chain of Command
3. Clinic asked to repay food dollars
4. Additional monitoring
5. Other program funds pulled (like Farmer's Market)
6. Mandatory technical assistance training
7. Mid-year monitoring
8. Annual overview of how the program is doing, if a new person joins the staff, more often
9. Clinic asked to pay for training (maybe down the road)
10. Require a Quality Improvement/Assurance plan
11. Mentoring by another clinic's staff
12. Cross-WIC clinic chart review
13. Progressive action (like progressive discipline)
14. Actions taken depending on number of findings 1-4 vs. 5-9 vs. 10-above.
15. Probation
16. Cut funding of poor performers and give to good performers
17. Self-monitoring
18. Take WIC contract away

Based on suggestions from the WFSG and comparisons with other State WIC agencies in our region, the MT WIC Program proposes the following tiered monitoring system to reward quality performance and move toward increasing performance levels of local agencies that have less than satisfactory monitoring evaluations.

The overall goal in re-working the Montana WIC monitoring system is to provide uniform standards for State monitoring teams and local agency staffs, tighten the reporting schedule, improve communication, and provide increased guidance to local agencies not meeting the standards and guidelines as per the State Plan.

Many of the procedures already in place would remain the same:

1. Local Agencies are monitored biannually
2. Monitored to determine if Local Agencies are meeting State Plan standards and guidelines

3. Participant file reviews are done from the State office
4. On-site observations are completed in the nutrition and administrative areas
5. Entrance and Exit interviews are performed to review issues and answer questions
6. Monitoring reports and corrective action requests are sent to the Local Agency
7. Local Agency responds to corrective action request

Standards would be put into place in the following areas:

1. The number of participant files reviewed would be determined by the following:

Local Agency participation	Less than 300	301 - 1000	1000 - 2000	2000 and up
Agency size	small	medium	large	large + satellite
Files reviewed	8	16	32	32 + 8

2. Fields of findings would be consolidated to include the following:

Administrative	Initial Contact Date		Nutrition	Risk Codes
Administrative	Residency		Nutrition	Low Risk Referrals
Administrative	Id		Nutrition	High Risk Referrals
Administrative	Income		Nutrition	Required Nutrition Topics
Administrative	Notice of Ineligibility		Nutrition	Food Package
Administrative	Adjunctive Eligibility		Nutrition	Education Documentation
Administrative	End of Certification Notice		Nutrition	Anthropometric Documentation
Administrative	Participant Records		Nutrition	Goal
Administrative	VOC Process		Nutrition	Followup on Referral
Administrative	Civil Rights / Confidentiality		Nutrition	Followup on Goal

- a. Other areas would be included in the monitoring process, but would result in an action to address the issues (on-site training, posters/signs, and discussion topics).
  - b. All monitoring areas would be listed in the monitoring form, but only the areas listed in the table would be considered fields where findings could occur.
  - c. The total number of files that have issues will also be a part of the monitoring report.
3. Based on file review and on-site observations, fields/findings and the number of occurrences would be totaled and entered into a monitoring spreadsheet. Scores would be calculated for each clinic monitored as well as combined for an overall Local Agency score. (see spreadsheet)
4. The **standard** level of performance expected to be achieved by local agencies is considered to be 80% or higher. The Local Agency monitoring score would be used to determine the tier and actions required:

**FIRST TIER:** Agencies with a score of 80% or more at the time the State performs the monitoring review will:

1. Submit a corrective action plan which addresses the area(s) where occurrences were found.

Follow up by State Office staff:

1. On-site monitoring visit in two years. (Current standard)

**SECOND TIER:** Agencies with a score of 65% to 79% at the time the State performs the monitoring review will:

1. Submit a corrective action plan addressing the areas where occurrences were found.
2. Clinic staff must retake the required M-Spirit on line training in the areas where a non-compliant occurrence was documented.
3. Agency will complete a self-monitoring of five (5) program charts per quarter; one chart from each WIC participant category. After the self-review is completed, the chart findings will be sent to the State office.
4. If at the fourth quarter (12-month) chart review there is no significant improvement in the reduction of occurrences, a meeting will be set up with State office staff, the local program staff and their management to discuss program integrity and performance standards.

Follow up by State Office staff:

1. On-site monitoring visit in two years.

**THIRD TIER:** Agencies with a score of less than 65% at the time the State performs the monitoring review will:

1. Participate in a state and local staff meeting, either in person or through a conference call, to address issues of program integrity and performance standards with all action items identified and committed to **before** a corrective action plan is submitted by the Local Agency for approval by the State office staff.
2. Submit the corrective action plan to the State office.
3. Clinic staff must retake the required M-Spirit on line training in the areas where a non-compliant occurrence was documented.
4. Agency will complete a self-monitoring of five (5) program charts per quarter; one chart from each WIC participant category. After the self-review is completed, the chart findings will be sent to the State office.
5. The State WIC office staff will perform a quality assurance chart review within six months following the monitoring visit and again at 12 months. Results of these reviews will be shared with the agency.
6. If at the fourth quarter (12-month) chart review by the State WIC office staff there is no significant improvement in the reduction of occurrences, a meeting will be set up with State agency staff, the local program staff and their management to discuss program integrity and performance standards.
7. Technical assistance from a competent source may be required.
8. On-site monitoring visit each year until a second tier score is received by the agency.
9. If the Local Agency has other WIC program contracts (i.e. Farmer's Market, BFPC), a discussion of possible non-renewal of those contracts will take place.

5. The Montana WIC monitoring staff will send the monitoring report within 30 days of the visit to ensure a timely and meaningful result. The Local Agency Corrective Action plan will be submitted to the State office within 30 days of receipt the monitoring report.
6. Monitoring plan will be reviewed with Local Agency staff at the fall training and evaluated after one year.